

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

TRAXCELL TECHNOLOGIES, LLC.,	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:17-cv-00042
	)	Lead Consolidated Case
	)	
	)	
HUAWEI TECHNOLOGIES USA INC.,	)	JURY TRIAL DEMANDED
Defendant.	)	

**AMENDED JOINT CLAIM CONSTRUCTION CHART**

Pursuant to Patent Rule 4-5(d) and the Court’s Docket Control Order, Plaintiff Traxcell Technologies, LLC (“Traxcell”) and Defendants Huawei Technologies USA, LLC (“Huawei”) and Nokia Solutions and Networks Oy and Nokia of America Corp. (“Nokia”) (“Defendants”) (collectively, “Parties”) hereby submit this Amended Joint Claim Construction Chart. The parties submit this amended joint claim construction chart because in their efforts to narrow the disputed issues for the Court, they have agreed to a proposed construction for two additional claim terms since filing the original joint claim construction chart. The two additional agreed terms are the “means for receiving . . .” terms set forth in the chart below. Other than removing these now undisputed claim terms, this joint claim construction statement is unchanged from the one filed on November 28, 2018.

The exhibits to this pleading contain the disputed claim language for the patents-in-suit as follows:

- Exhibit A - U.S. Patent No. 8,977,284 (“284 patent”);
- Exhibit B - U.S. Patent No. 9,510,320 (“320 patent”); and,
- Exhibit C - U.S. Patent No. 9,642,024 (“024 patent”).

These charts include the Parties' proposed constructions for disputed terms only. The Parties agree to proposed constructions for the following terms.

Asserted Claims	Term	Agreed Construction
'284 patent – claim 1 (corrective action) '284 Patent – claim 12 (correcting) '320 Patent – claims 1 and 4 (corrective action)	corrective action / correcting	Plain and ordinary meaning should apply or no construction is necessary.
'284 patent – claims 1 and 12	radio tower	base station transceiver subsystem and associated antenna(s)
'284 patent – claims 1 and 12	means for receiving said performance data and suggest corrective actions obtained from a list of possible causes for said radio tower based upon the performance data and the corresponding location associated with said at least one wireless device  '284 Patent – claim 1  means for receiving said performance data and corresponding locations from said radio tower and correcting radio frequency signals of said radio tower in order to improve communication with said wireless devices  '284 Patent – claim 1	Structure: The algorithm disclosed in Fig. 38-A, Fig. 38-B, and Fig. 38-C and described at col. 54, line 21 through col. 55, line 41.  Function: “receiving said performance data and suggest corrective actions obtained from a list of possible causes for said radio tower based upon the performance data and the corresponding location associated with said at least one wireless device” (claim 1) / “receiving said performance data and corresponding locations from said radio tower and correcting radio frequency signals of said radio tower in order to improve communication with said wireless devices” (claim 12)

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record who have appeared in this case are being served today, December 6, 2018, with a copy of the foregoing via e-mail to counsel of record.

/s/ Marc Kaplan

Marc Kaplan